

Exhibit A

HAFETZ & NECHELES LLP

ATTORNEYS AT LAW

10 EAST 40TH STREET, 48TH FLOOR
NEW YORK, N.Y. 10016
TELEPHONE: (212) 997-7400
TELECOPIER. (212) 997-7646

March 16, 2019

VIA EMAIL

AUSAs Moira Penza, Tanya Hajjar, and Mark Lesko
United States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Raniere, et al.*, 18-cr-204 (NGG) (VMS)

Dear Moira, Tanya and Mark:

Pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure, defendant Bronfman demands the following particulars related to the S2 indictment.¹

Count 1 – RICO Conspiracy

1. Please identify whether there are additional racketeering acts in addition to the specific acts alleged in Count Two that the government intends to introduce evidence of at trial. In particular, please specify any alleged violations of the following statutes that the government intends to prove at trial, as these offenses are listed in Count One as statutes violated pursuant to the pattern of racketeering activity the defendants agreed to participate in, but are nowhere charged in the indictment or included as enumerated racketeering acts in Count Two: 18 U.S.C. § 1512 (obstruction of justice and obstruction of justice conspiracy), 18 U.S.C. § 1590 (trafficking in persons), 18 U.S.C. § 1952 (interstate and foreign travel in aid of racketeering), and 18 U.S.C. § 1957 (money laundering).

2. Please identify the regulatory agencies allegedly evaded in 6(g).
3. Please identify the co-conspirators who were allegedly part of the Enterprise charged in the S2 Indictment.

¹ By demanding new particulars related to the S2 Indictment, we do not waive or abandon our requests for particulars related to the S1 Indictment. Our motion related to our demand for particulars with respect to the S1 Indictment is currently pending before the Court, and we continue to request that the government provide the particulars demanded previously.

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Count 2 – Racketeering

4. Please identify Jane Does 1, 2, 3, 4, 5, 6, 7, and 8, and John Does 1 and 2.
5. Racketeering Act 5 – Please identify each person whose “means of identification” defendants Bronfman and Raniere allegedly conspired to transfer, possess, and use, without lawful authority as alleged in Racketeering Act 5A.
6. Racketeering Act 8 – Please identify the specific wire transfers that the indictment alleges were in furtherance of visa fraud. Please identify the alleged false statement or document presented as part of a visa application, and identify the particular visa applicant, type of visa, and date of application that contains the alleged false statement.
7. Racketeering Act 11 – Please identify the date(s) of the allegedly false offer of employment, and specify the individual visa applicant(s), type of visa(s), and date of application(s) that it was submitted in support of. Please identify the allegedly false statement or statements in the letter.
8. Racketeering Act 14 and Count 11– As we have previously demanded, please identify the tax allegedly due and evaded as alleged in Racketeering Act 14 and Count 11.

Please provide the demanded particulars immediately to enable Ms. Bronfman to prepare for trial.

Sincerely,

/s/

Kathleen E. Cassidy

cc: All defense counsel (by email)